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Ultimate Fighting Championship and UFC
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17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 Cung Le, Nathan Quarry, Jon Fitch, Brandon
20 Vera, Luis Javier Vazquez, and Kyle Kingsbury,
on behalf of themselves and all others similarly
21 situated,

22 Plaintiffs,

23 v.

24 Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

25
26 Defendant
27
28

No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF NICHOLAS A.
WIDNELL IN SUPPORT OF THE
PARTIES' JOINT AGREED
MOTION FOR LEAVE TO FILE
SUMMARY JUDGMENT BRIEFING
MATERIALS IN EXCESS OF PAGE
LIMITS IMPOSED BY LOCAL RULE
7-3**

1 I, Nicholas A. Widnell, declare as follows:

2 1. I am a member in good standing of the bar of the District of Columbia. I am
3 admitted *pro hac vice* to practice before this Court. I am a Partner in the law firm Boies Schiller
4 Flexner LLP (“BSF”), counsel for Zuffa, LLC (“Zuffa”) in the above captioned action in the U.S.
5 District Court for the District of Nevada, *Le et al. v. Zuffa, LLC*, No. 2:15-cv-01045-RFP-PAL.

6 2. I make this declaration in support of the Parties’ Joint Agreed Motion for Leave to
7 File Summary Judgment Briefing Materials in Excess of Page Limits Imposed By Local Rule 7-3.

8 3. Based on my review of the files, records, and communications in this case, I have
9 personal knowledge of the facts set forth in this Declaration and, if called to testify, could and would
10 testify competently to those facts under oath.

11 4. Counsel for Zuffa met and conferred with counsel for Plaintiffs regarding modifying
12 the page limits related to Zuffa’s Motion for Summary Judgement briefing. The parties reached an
13 agreement regarding modification of the page limits as specified in District of Nevada Local Rule 7-
14 3(a).

15 5. The parties jointly move the Court to permit the parties to allocate 40 pages for
16 Zuffa’s Motion for Summary Judgment, 40 pages for Plaintiffs’ Opposition to Zuffa’s Motion for
17 Summary Judgment, and 21 pages for Zuffa’s Reply in Support of its Motion for Summary
18 Judgment.

19 6. The case was filed in December 2014. The Consolidated Amended Complaint
20 includes theories of liability based on both monopolization and monopsonization.

21 7. Plaintiffs are seeking over one billion dollars in damages before trebling.

22 8. Since the case was filed, the parties have engaged in extensive fact and expert
23 discovery, including several million documents, more than 50 depositions, and more than 900 pages
24 of expert reports.

25 9. Zuffa has produced over 3.2 million pages of documents plus native files. Plaintiffs
26 have produced approximately 64,000 pages of documents. The parties subpoenaed documents from
27 numerous third parties, totaling over 318,000 pages of documents.

28 10. The parties took more than 50 depositions.

11. In total, the parties have exchanged 855 pages of opening, opposition, and rebuttal expert reports. Excluding exhibits, resumes, errata and appendices, Plaintiffs' opening expert reports for its three expert reports totaled 316 pages. Excluding exhibits, resumes, errata and appendices, Zuffa's opposition expert reports for its five expert reports totaled 255 pages. Excluding exhibits, resumes, errata and appendices, Plaintiffs' rebuttal expert reports for its four expert reports totaled 284 pages.

12. Due to the extensive nature of discovery in this case and the complexity of the record, the parties seek leave from the Court to extend the page limits in order to ensure that all material issues can be adequately addressed.

13. I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct. Executed this 27 day of July, 2018 in Washington, D.C.

/s / Nicholas A. Widnell

Nicholas A. Widnell